

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

3G LICENSING, S.A., KONINKLIJKE KPN
N.V., and ORANGE S.A.,

Plaintiffs,

V.

BLACKBERRY LIMITED and BLACKBERRY
CORPORATION,

Defendants.

3G LICENSING, S.A., KONINKLIJKE KPN
N.V., and ORANGE S.A.,

Plaintiffs,

V.

LENOVO GROUP LTD., LENOVO HOLDING
CO., INC., LENOVO (UNITED STATES) INC.
and MOTOROLA MOBILITY LLC,

Defendants.

3G LICENSING, S.A., KONINKLIJKE KPN
N.V., and ORANGE S.A.,

Plaintiffs,

V.

LG ELECTRONICS INC., LG ELECTRONICS,
U.S.A., INC. and LG ELECTRONICS
MOBILECOMM U.S.A., INC.,

Defendants.

KONINKLIJKE KPN N.V.,

Plaintiff,

v.

GEMALTO IOT LLC, GEMALTO M2M GMBH,
and GEMALTO INC.,

Defendants.

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) C.A. No. 17-86-LPS-CJB

)
) **JURY TRIAL DEMANDED**

KONINKLIJKE KPN N.V.,

Plaintiff,

v.

KYOCERA CORPORATION and KYOCERA
INTERNATIONAL, INC.,

Defendants.

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)
) C.A. No. 17-87-LPS-CJB

)
) **JURY TRIAL DEMANDED**

KONINKLIJKE KPN N.V.,

Plaintiff,

v.

NEC CORPORATION and NEC CORPORATION
OF AMERICA,

Defendants.

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)
) C.A. No. 17-88-LPS-CJB

)
) **JURY TRIAL DEMANDED**

KONINKLIJKE KPN N.V.,

Plaintiff,

v.

SIERRA WIRELESS, INC. and SIERRA
WIRELESS AMERICA, INC.,

Defendants.

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) C.A. No. 17-90-LPS-CJB

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) **JURY TRIAL DEMANDED**

KONINKLIJKE KPN N.V.,

Plaintiff,

v.

TCL COMMUNICATION, INC., TCL
COMMUNICATION TECHNOLOGY HOLDING
LIMITED, TCT MOBILE, INC., TCT MOBILE
(US) INC., and TCT MOBILE (US) HOLDINGS,
INC.,

Defendants.

C.A. No. 17-91-LPS-CJB

JURY TRIAL DEMANDED

KONINKLIJKE KPN N.V.,

Plaintiff,

v.

TELIT WIRELESS SOLUTIONS, INC.,

Defendant.

C.A. No. 17-92-LPS-CJB

JURY TRIAL DEMANDED

**DEFENDANTS' MOTION FOR JUDGMENT ON THE PLEADINGS
THAT U.S. PATENT NO. 6,212,662 IS INVALID UNDER 35 U.S.C. § 101**

Pursuant to Fed. R. Civ. P. 12(c), Defendants BlackBerry Limited, BlackBerry Corporation, Lenovo Holding Co., Inc., Lenovo (United States) Inc., Gemalto IOT LLC, Gemalto M2M GmbH, Gemalto Inc., Kyocera Corporation, Kyocera International, Inc., LG Electronics Inc., LG Electronics U.S.A., Inc., LG Electronics MobileComm U.S.A., Inc., NEC Corporation, NEC Corporation of America, Sierra Wireless, Inc., Sierra Wireless America, Inc., TCL Communication, Inc., TCL Communication Technology Holding Limited, TCT Mobile, Inc., TCT Mobile (US) Inc., TCT Mobile (US) Holdings, Inc., and Telit Wireless Solutions, Inc. (collectively "Defendants") respectfully move for judgment on the pleadings that claims 1-4 of U.S. Patent No. 6,212,662 are invalid under 35 U.S.C. § 101 as patent-ineligible. The grounds for this motion are set forth in Defendants' Opening Brief, submitted herewith.

Respectfully submitted,

OF COUNSEL:

Eric Kraeutler
John V. Gorman
MORGAN, LEWIS & BOCKIUS LLP
1701 Market Street
Philadelphia, PA 19103-2921
Tel: (215) 963-5000

Robert C. Bertin
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Avenue N.W.
Washington, DC 20004-2541
Tel: (202) 739-3000

OF COUNSEL:

Jonathan E. Retsky
Kathleen B. Barry
James Winn
WINSTON & STRAWN LLP
35 West Wacker Drive
Chicago, IL 60601
Tel: (312) 558-5600

Andrew R. Sommer
WINSTON & STRAWN LLP
1700 K Street, N.W.
Washington, D.C. 20006-3817
Tel: (202) 282-5000

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Amy M. Dudash
Colm F. Connolly (#3151)
Amy M. Dudash (#5741)
The Nemours Building
1007 North Orange Street, Suite 501
Wilmington, DE 19801
Tel: (302) 574-3000
colm.connolly@morganlewis.com
amy.dudash@morganlewis.com

*Attorneys for Defendants BlackBerry Limited
and BlackBerry Corporation*

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

By: /s/ Jack B. Blumenfeld
Jack B. Blumenfeld (#1014)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
Tel: (302) 658-9200
jblumenfeld@mnat.com

*Attorneys for Defendants Lenovo Holding Co.,
Inc., and Lenovo (United States) Inc.*

OF COUNSEL:

Peter H. Kang
Ashish Nagdev
Jinyung Lee
SIDLEY AUSTIN LLP
1001 Page Mill Road, Building 1
Palo Alto, CA 94304
Tel: (650) 565-7000

Ryan M. Sandrock
SIDLEY AUSTIN LLP
555 California Street, Suite 2000
San Francisco, California 94104
Tel: (415) 772-1200

OF COUNSEL:

Brian A. Rosenthal
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, NY 10166-0193
Tel: (212) 351-4000

Colby A. Davis
GIBSON, DUNN & CRUTCHER LLP
333 South Grand Avenue
Los Angeles, CA 90071
Tel: (213) 229-7000

Brian K. Andrea
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Ave., N.W.
Washington, DC 20036-5306
Tel: (202) 955-8500

MORRIS NICHOLS ARSHT & TUNNELL

By: /s/ Rodger D. Smith
Rodger D. Smith (#3778)
1201 North Market Street, 16th Floor
P.O. Box 1347
Wilmington, DE 19899-1347
Tel: (302) 351-9205
rsmith@mnat.com

*Attorneys for Defendants LG Electronics Inc.,
LG Electronics U.S.A., Inc., and LG
Electronics MobileComm U.S.A., Inc.*

POTTER ANDERSON & CORROON LLP

By: /s/ Bindu A. Palapura
David E. Moore (#3983)
Bindu A. Palapura (#5370)
Stephanie E. O'Byrne (#4446)
Hercules Plaza, 6th Floor
1313 N. Market Street
Wilmington, DE 19801
Tel: (302) 984-6000
dmoore@potteranderson.com
bpalapura@potteranderson.com
sobyne@potteranderson.com

*Attorneys for Defendants Gemalto IOT LLC,
Gemalto M2M GmbH, and Gemalto Inc.*

OF COUNSEL:

David L. Witcoff
Marc S. Blackman
Thomas W. Ritchie
JONES DAY
77 West Wacker
Chicago, IL 60601-1692
Tel: (312)782-3939

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

By: /s/ Stephen J. Kraftschik
Mary B. Graham (#2256)
Stephen J. Kraftschik (#5623)
1201 N. Market Street
P.O. Box 1347
Wilmington, DE 19899-1347
Tel: (302) 658-9200
mgraham@mnat.com
skraftschik@mnat.com

*Attorneys for Defendants Kyocera Corporation
and Kyocera International, Inc.*

OF COUNSEL:

Stuart W. Yothers
Kevin V. McCarthy
JONES DAY
250 Vesey Street
New York, NY 10281-1047
Tel: (212) 326-3939

Maxwell A. Fox
JONES DAY
Kamiyacho Prime Place
1-17, Toranomom 4-Chome
Minato-Ku, Tokyo 105-0001, Japan
Tel: +81.3.6800.1876

ASHBY & GEDDES

By: /s/ Steven J. Balick
Steven J. Balick (#2114)
Andrew C. Mayo (#5207)
500 Delaware Avenue, 8th Floor
P.O. Box 1150
Wilmington, DE 19899
Tel: (302) 654-1888
sbalick@ashby-geddes.com
amayo@ashby-geddes.com

*Attorneys for Defendants NEC Corporation
and NEC Corporation of America*

OF COUNSEL:

Adam Alper
Eric Cheng
KIRKLAND & ELLIS LLP
555 California Street
San Francisco, CA 94104
Tel: (415) 439-1400

Michael W. De Vries
Robert Taylor
KIRKLAND & ELLIS LLP
333 S. Hope Street
Los Angeles, CA 90071
Tel: (213) 680-8400

OF COUNSEL:

William P. Quinn, Jr.
MORGAN, LEWIS & BOCKIUS LLP
1701 Market Street
Philadelphia, PA 19103
Tel: (215) 963-5000

Bradford A. Cangro
Hang Zheng
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Ave., NW
Washington, D.C. 20004-2541
Tel: (202) 739-3000

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

By: /s/ Jack B. Blumenfeld
Jack B. Blumenfeld (#1014)
Jeremy A. Tigan (#5239)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
Tel: (302) 658-9200
jblumenfeld@mnat.com
jtigan@mnat.com

*Attorneys for Defendants Sierra Wireless, Inc.
and Sierra Wireless America, Inc.*

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Jody C. Barillare
Jody C. Barillare (#5107)
The Nemours Building
1007 N. Orange Street, Suite 501
Wilmington, DE 19801
Tel: (302) 547-3000
jody.barillare@morganlewis.com

*Attorneys for Defendants TCL Communication,
Inc., TCL Communication Technology Holding
Limited, TCT Mobile, Inc., TCT Mobile (US)
Inc., and TCT Mobile (US) Holdings, Inc.*

OF COUNSEL:

David A. Loewenstein
Guy Yonay
Clyde A. Shuman
PEARL COHEN ZEDEK LATZER BARATZ LLP
1500 Broadway, 12th Floor
New York, NY 10036
Tel: (646) 878-0800

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

By: /s/ Jack B. Blumenfeld
Jack B. Blumenfeld (#1014)
Rodger D. Smith (#3778)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
Tel: (302) 658-9200
jblumenfeld@mnat.com
rsmith@mnat.com

*Attorneys for Defendant Telit Wireless
Solutions, Inc.*

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5367346 / 43915